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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

NATHAN POOL, individually, and on behalf
of other members of the general public
similarly situated;

Plaintiff,

v.

UTC RESTAURANT VENTURE, LLC, a
California limited liability company; PASEO
RESTAURANT VENTURE, LLC, a
California limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 20STCV07785 (Lead Case)
Consolidated Case No.: 20GDCV00377

Honorable Amy D. Hogue
Department SSC7

CLASS ACTION

**DECLARATION OF NORMAN
ALCANTARA REGARDING THE CLASS
LIST AND ESTIMATES**

[Plaintiff's Renewed Motion for Preliminary
Approval of Class Action Settlement;
Declaration of Proposed Class Counsel (Edwin
Aiwarzian); Declaration of Proposed Class
Representative (Nathan Pool); and [Proposed]
Order filed concurrently herewith]

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1. I am employed as a Case Manager by Simpluris, Inc. (“Simpluris”), the settlement administrator in the above-entitled action. Our Corporate Office address is 3194-C Airport Loop Drive, Costa Mesa, CA 92626. My telephone number is (714) 640-5654. I am over twenty-one years of age and authorized to make this declaration on behalf of Simpluris and myself.

3. On September 9, 2021, Counsel for Defendant provided Simpluris with a mailing list (“Class List”) containing Class Members’ names, most recent mailing address and telephone numbers, social security numbers, and pertinent employment information for each Class Member during the period from February 27, 2016 to October 20, 2020 (“Class Period”). The Class List contained data for five hundred fifty seven (557) individuals identified as Class Members and/or PAGA Members.

5. For the PAGA Class, there are three hundred thirty five (335) PAGA Members. The total workweeks for the PAGA Class is 3,978.07 PAGA Workweeks. The *average estimated Individual PAGA Payment* is \$37.31, the *highest estimated Individual PAGA Payment* is \$188.53,

1 and the ***lowest estimated Individual PAGA Payment*** is \$3.14. There are two class members in both the
2 Settlement Class and the PAGA Class.

3 I declare under penalty of perjury under the laws of the State of California that the foregoing is
4 true and correct. Executed this 21st day of December, 2021, in Costa Mesa, California.
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8 Norman Alcantara
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